UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – FLINT

IN THE MATTER OF:

Helen Y. Cameron

Case No. 16-32931
Chapter 13
Hon. Daniel S. Opperman

Debtor(s).
______________________________/

TRUSTEE'S AMENDED OBJECTION TO DEBTOR'S MOTION TO REINSTATE CASE

NOW COMES the Chapter 13 Standing Trustee, Carl L. Bekofske, and amends his objection to Debtor's Motion to Reinstate Case and in support thereof states as follows:

1. The Trustee opposes reinstatement of this case.
2. No financial documents have been received by the Chapter 13 Trustee.
3. The required pleadings such as plan, schedules, statement of financial affairs and means test have not been filed with this Court.
4. Debtor has not shown that she qualifies to be a Debtor under Chapter 13 in that she has a regular source of income of which to fund a Chapter 13 plan.
5. It is unclear based upon the Petition whether the Debtor has met the venue requirements to file a case in this District.
6. Upon information and belief it appears that the Debtor has filed several bankruptcy cases in the United States Bankruptcy Court District of Massachusetts (Boston). (See attached Exhibit 1 – National PACER search results).
7. Upon motion from the Massachusetts Chapter 13 Trustee and US Trustee, in bankruptcy case 13-10115 the Debtor was barred from filing a bankruptcy

case in any jurisdiction for two years pursuant to Order dated 4/18/2013 document #91. (Opinion from the Massachusetts Bankruptcy Court attached as Exhibit 2)

8. The Debtor's Bankruptcy Petition Coversheet signed under the penalty of perjury filed in the instant case 16-32931-DOF and identified as document number 25 pursuant to the Court's PACER reflects that the Debtor had never filed for bankruptcy before. This appears to be a misrepresentation to this Honorable Court as a search of the Debtor's information on the National PACER reveals several cases filed in Massachusetts.

WHEREFORE, the Chapter 13 Standing Trustee requests that this Honorable Court deny the Debtor's motion to reinstate Chapter 13, and grant any further and other relief as this Court deems equitable and just such as an amendment to the dismissal order barring debtor from refiling.

Dated: February 7, 2017

/s/ Carl L. Bekofske
Carl L. Bekofske (P10645)
Chapter 13 Standing Trustee
400 N. Saginaw St. 331
Flint, MI 48502
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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2017, I electronically filed the Chapter 13 Trustee's Amended Objection to Debtors' Motion to Reinstate Case with the Clerk of the Court using ECF system; which will send notification to the following:

The following parties were served via First Class Mail at the address below by depositing same in a United States Postal Box with the lawful amount of posting affixed thereto:

Helen Y. Cameron
P. O. Box 260672
Boston, MA 02126

/s/ Sherry Beasinger
Sherry Beasinger
Chapter 13 Standing Trustee
400 N. Saginaw St. 331
Flint, MI 48502
(810) 238-4675
ecf@flint13.com